

Statement

by

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6100 Oak Tree Boulevard
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at a meeting of

The Standards Board
Kentucky Department of Labor
Frankfort, Kentucky

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My name is Anton Vittone. I am president of B.F. Goodrich Chemical Company, a division of The B.F. Goodrich Company of Akron, Ohio. With me today are Mr. Philip H. Lawrence, manager of our Louisville plant; Dr. John L. Creech, our plant physician at Louisville, and Dr. Richard A. Guyton, who is representing our corporate medical department.

Our statement today will address itself specifically to the question of whether the State of Kentucky should adopt a standard which would limit the amount of vinyl chloride vapor to a time-weighted average of 50 parts per million in the work areas of vinyl chloride and polyvinyl chloride production facilities.

Our comments will summarize information that we have already provided in our continuing reports to Dr. J. Bradford Block and to appropriate Federal agencies.

We also have available and will file for the record of this meeting a copy of the statement we presented on Friday, February 15 at a fact-finding hearing in Washington, D.C., under the jurisdiction of the Occupational Safety and Health Administration of the U. S. Department of Labor.

In that statement, we reviewed the technologies involved in our use of vinyl chloride at our Louisville and other PVC manufacturing operations. We also discussed our knowledge of the toxicity of vinyl chloride and we reviewed in detail the events leading up to our initial meeting with the Kentucky Department of Labor on this matter.

Our recent discovery of five deaths from a rare type of liver cancer among former employees of our Louisville plant was, to our knowledge, the first evidence indicating a possible relationship between human angiosarcoma and chlorinated hydrocarbons used in the production of polyvinyl chloride resins.

In addition, we discussed the epidemiological studies that we are pursuing independently and also our support and cooperation in research sponsored by the Manufacturing Chemists Association's Vinyl Chloride Task Group.

We established on June 21, 1973, an interim goal of 50 ppm TWA and, as a result of improvements in monitoring and precautionary safety activities, we have essentially achieved this goal at Louisville, Calvert City and at our other PVC production facilities.

Our efforts to achieve this or lower levels of exposure began after the Manufacturing Chemists Association learned of animal research which had been initiated by some European PVC manufacturers.

Since our discovery of a grouping of deaths from angiosarcoma of the liver among employees, we have adopted the 50 ppm TWA and other measures that amount to self-imposed emergency work standards. These include our efforts to implement the interim work practices recommended on January 31 by the National Institute of Occupational Safety and Health.

An up-to-date presentation of the previously mentioned European research was made by Professor Cesare Maltoni, of the Instituto Di Oncologia, Bologna, Italy, at the OSHA hearing in Washington on February 15. While Dr. Maltoni said that additional research is indicated, his studies showed no tumors among laboratory animals at vinyl chloride exposure of 50 ppm.

In addition, the Dow Chemical Company, and a producer of vinyl chloride, at the OSHA hearing held in Washington on February 15, made the following statement:

"Based upon the medical and toxicological data available to us at this time, Dow believes that an eight-hour TWA of 50 ppm is a satisfactory environmental standard for vinyl chloride."

From our viewpoint, the adoption of a 50 ppm TWA for vinyl chloride as a standard is consistent with available information.

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